

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECLAIM THE RECORDS, ALEC FERRETTI,
ALEX CALZARETH, RICH VENEZIA,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

Notice of Motion

23 Civ. 1997 (PAE)

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the United States Citizenship and Immigration Services' Motion to Dismiss, for Summary Judgment, or for Severance, and the August 6, 2024 Declaration by James Baxley, Defendant the United States Citizenship and Immigration Services, by its attorney, Damian Williams, U.S. Attorney for the Southern District of New York, hereby moves this Court for an order dismissing the complaint pursuant to Rule 12(b)(1) or 12(b)(6), or in the alternative granting summary judgment pursuant to Rule 56, or severing the claims in the Complaint pursuant to Rule 21, of the Federal Rules of Civil Procedure.

Dated: August 9, 2024
New York, New York

DAMIAN WILLIAMS
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Southern District of New York
Attorney for Defendant

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